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Proposed Lead Counsel for Proposed Lead Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CITY OF MIAMI FIRE FIGHTERS' AND)
POLICE OFFICERS' RETIREMENT TRUST,)
Individually and on Behalf of All Others)
Similarly Situated,)

Plaintiff,)

vs.)

OKTA, INC., et al.,)

Defendants.)

Case No. 3:22-cv-02990-SI

CLASS ACTION

DR. KATHRYN M. FLYNN'S RESPONSE
TO COMPETING LEAD PLAINTIFF
MOTIONS

DATE: August 26, 2022
TIME: 10:00 a.m.
CTRM: 1, 17th Floor
JUDGE: Hon. Susan Illston

Three motions were filed by putative class members seeking appointment as lead plaintiff in the above-captioned securities class action. *See* ECF 14, 22, 28. Pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”), district courts are to adopt a presumption that the applicant with the largest financial interest in the relief sought by the class that also satisfies the requirements of Fed. R. Civ. P. 23 is the “most adequate plaintiff.” 15 U.S.C. §78u-4(a)(3)(B)(iii).

Here, while Dr. Kathryn M. Flynn suffered approximately \$909,5594 in losses as a result of defendants’ alleged wrongdoing and satisfies the Rule 23 requirements at this stage, Dr. Flynn recognizes she did not suffer the greatest loss. If the Court determines that the movant with greater losses does not satisfy the PSLRA’s requirements for appointment as lead plaintiff, Dr. Flynn remains ready, willing, and able to fulfill that role on behalf of the class.

DATED: August 2, 2022

Respectfully submitted,

ROBBINS GELLER RUDMAN
& DOWD LLP
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Proposed Lead Counsel for Proposed Lead
Plaintiff

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on August 2, 2022, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Danielle S. Myers
DANIELLE S. MYERS

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Mailing Information for a Case 3:22-cv-02990-SI City of Miami Fire Fighters and Police Officers Retirement Trust v. Okta, Inc. et al

Electronic Mail Notice List

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)